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GROUP EXHIBIT A

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Please send remittance to: SMITH GAMBRELL & RUSSELL LLP PO BOX 930930 ATLANTA, GA 31193-0930

Main: 404-815-3500 www.sgrlaw.com



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.001 Invoice No. 1130031

Elizabeth L. Janczak

Matter: Representation of BDC Creditors' Committee

For Professional Services......\$16,277.50

Current Invoice Amount.......\$16,277.50

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit Group Exhibit A Page 3 of 51

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ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Page 1
Date: September 12, 2023
Matter: 912600.001
Invoice No. 1130031

Elizabeth L. Janczak

Matter: Representation of BDC Creditors' Committee

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
06/26/23	ELJ	Telephone conference with Shelly DeRousse regarding initial Committee tasks, strategy, and next steps (0.2).	500.00	.20	100.00
06/26/23	SAD	Telephone conference with Elizabeth Janczak regarding case strategy and schedule of open issues (0.2).	595.00	.20	119.00
06/27/23	ELJ	Telephone conference with Shelly DeRousse regarding initial calls with BDC and Keystone, and next steps (0.1); review docket relating to deadlines and pending motions (0.3).	500.00	.40	200.00
06/27/23	SAD	E-mail correspondence to Austin Peiffer regarding meeting to discuss case (0.1); telephone conference with Elizabeth Janczak regarding committee meeting and other issues (0.1).	595.00	.20	119.00
06/27/23	ТМН	Telephone conference with Elizabeth Janczak regarding new bankruptcy matter in NDIA (0.2); coordinate with Leslie Frausto regarding same and status of same (0.1); review for next steps for appearances and PHV motions (0.2).	500.00	.50	250.00

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 Matter:
 912600.001
 Page 2

 Invoice No.
 1130031
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
06/28/23	ELJ	Telephone conference with Kristina Stanger and Shelly DeRousse regarding open case issues, prior evidentiary hearing, and next steps (1.4); telephone conference with Austin Peiffer and Shelly DeRousse regarding open case issues, secure lender items, DIP budget, and strategy for reorganization (0.9); conference with Shelly DeRousse regarding initial case strategy and open tasks (0.1); telephone conference with Toni Helton regarding retention and pro hac applications (0.1); review pleadings for open case issues in preparation for calls with Kristina Stanger and Austin Peiffer (0.9); draft agenda for 6/29 committee call (0.3); e-mail correspondence with Abe Carls regarding loan documents and additional requested information (0.1); review and analyze information from various conference calls and next steps to propose to committee based on same (0.7).	500.00	4.50	2250.00
06/28/23	JW	Draft appearance for Tonita Helton (0.2); e-mail correspondence with Elizabeth Janczak and Tonita Helton regarding same (0.1); file same (0.1); review local rules regarding pro hac vice admission (0.6); draft motions for pro hac vice for Elizabeth Janczak and Shelly DeRousse (0.8); draft proposed orders regarding same (0.2); multiple e-mail correspondence with Elizabeth Janczak, Shelly DeRousse, and Tonita Helton regarding same (0.2); file same (0.2); submit proposed orders regarding same (0.1); order certificates of good standing for Elizabeth Janczak and Shelly DeRousse per pro hac vice admission requirements (0.4).	315.00	2.90	913.50
06/28/23	SAD	Conference with Elizabeth Janczak regarding preparation for call with debtor's counsel and schedules (0.3); telephone conference with Kristina Stanger and Elizabeth Janczak regarding case history (1.4); telephone conference with Austin Peiffer and Elizabeth Janczak regarding case administration, plan and open issues (0.9).	595.00	2.50	1487.50
06/28/23	ТМН	Continue to coordinate with Elizabeth Janczak and team regarding new bankruptcy matter in NDIA (0.3); review appearance and PHVC motions regarding same (0.2); coordinate with Jacqueline Webster regarding same and status of same (0.1).	500.00	.60	300.00

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 Matter:
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 Page 3

 Invoice No.
 1130031
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
06/29/23	ELJ	Review first day declaration and pending motions for potential case issues and objections (0.5).	500.00	.50	250.00
06/30/23	ELJ	Attend status hearing on DIP motion and schedules (0.5); email correspondence to Abe Carls requesting initial documents and information (0.2); e-mail correspondence to Austin Peiffer regarding initial documents and information (0.2); e-mail correspondence to Committee regarding 6/30 hearing and discussions with other case parties (0.2).	500.00	1.10	550.00
06/30/23	JW	Draft appearance for Shelly DeRousse and Elizabeth Janczak (0.2); e-mail correspondence with Shelly DeRousse and Elizabeth Janczak (0.1); file same (0.2).	315.00	.50	157.50
06/30/23	SAD	Attend status hearing on DIP financing and schedules (0.5).	595.00	.50	297.50
07/05/23	ELJ	Telephone conference with Morgan Manley regarding various assignments including common interest agreement, equipment analysis, and chapter 5s analysis (0.3); e-mail correspondence to Morgan Manley regarding background information and documents for same (0.3); telephone conference with Janet Reasoner and Claire Davidson regarding open case issues including 341 meeting, DIP financing, and case administration (1.0); review and prepare for same (0.2).	500.00	1.80	900.00
07/05/23	MVM	Telephone conference with Elizabeth Janczak concerning common interest agreement (0.1); draft common interest agreement (0.5); e-mail correspondence to Elizabeth Janczak regarding same (0.1).	425.00	.70	297.50
07/05/23	MVM	Telephone conference with Elizabeth Janczak concerning review of schedules concerning equipment, vehicles, titles and common interest agreement (0.3).	425.00	.30	127.50
07/06/23	ELJ	Review common interest agreement (0.1); conference with Shelly DeRousse regarding status of open case issues including DIP order and agreement, preparation for 341 meeting, and analysis of assets (0.2).	500.00	.30	150.00
07/06/23	ELJ	Begin review hearing transcripts in preparation for 341 meeting of creditors (0.8).	500.00	.80	400.00
07/06/23	MVM	Incorporate edits to common interest agreement (0.1); email correspondence to Elizabeth Janczak regarding same (0.1).	425.00	.20	85.00
07/06/23	SAD	Conference with Elizabeth Janczak regarding various case issues (0.2).	595.00	.20	119.00

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Matter: 912600.001 Page 4
Invoice No. 1130031 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/07/23	ELJ	Continue reviewing hearing transcripts in preparation for 341 meeting of creditors (1.8); follow up e-mail correspondence to Abe Carls and Austin Peiffer regarding Committee document requests (0.1).	500.00	1.90	950.00
07/10/23	ELJ	Telephone conferences with Shelly DeRousse regarding DIP financing issues, collateral perfection issues, amended schedules, and upcoming 341 meeting (0.2); review prepetition litigation dockets and complaints in preparation for 341 meeting (0.4); draft outline of questions for 341 meeting (0.6).	500.00	1.20	600.00
07/10/23	SAD	Review letter from creditor for stay violation (0.1); telephone conference with Austin Peiffer regarding documents needed (0.3).	595.00	.40	238.00
07/10/23	SAD	Telephone conference with Elizabeth Janczak regarding DIP loan issues and 341 meeting (0.2).	595.00	.20	119.00
07/11/23	ELJ	Attend 341 meeting of creditors (2.3); summarize notes from same (0.1).	500.00	2.40	1200.00
07/11/23	SAD	Conference with Elizabeth Janczak regarding 341 meeting (0.2).	595.00	.20	119.00
07/14/23	JW	File witness and exhibit list for $7/20$ hearing (0.1) ; serve same and exhibits to parties of record (0.3) .	315.00	.40	126.00
07/17/23	ELJ	Telephone conference with Janet Reasoner and Claire Davidson regarding professional fee applications, DIP order issues, and investigation of prepetition conduct (0.7).	500.00	.70	350.00
07/17/23	JW	Re-send exhibits for July 20, 2023 hearing to United States Trustee (0.1).	315.00	.10	31.50
07/19/23	ELJ	Review BDC insurance policies for extent of coverage (0.4).	500.00	.40	200.00
07/20/23	ELJ	Attend hearing on ABLS employment and final DIP hearing (1.8).	500.00	1.80	900.00
07/20/23	SAD	Attend hearing on DIP loan and ABLS employment telephonically (1.5).	595.00	1.50	892.50
07/27/23	ELJ	Telephone conference with Shelly DeRousse regarding status of DIP financing, asset investigation, and other case issues (0.1); telephone conference with Austin Peiffer regarding open case issues including asset appraisal, chapter 11 plan progress, and secured lender issues (0.3).	500.00	.40	200.00
07/27/23	SAD	Telephone conference with Elizabeth Janczak regarding status of case (0.1).	595.00	.10	59.50

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 Matter:
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 Page 5

 Invoice No.
 1130031
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
08/09/23	ELJ	Telephone conference with Austin Peiffer regarding various case open items including asset appraisals, chapter 11 plan, and lease rejection motion (0.3).	500.00	.30	150.00
08/10/23	ELJ	Telephone conference with Terry Gibson regarding motion to set deadline to reject leases, lift stay motion, and potential equipment sales (0.5); e-mail correspondence with Austin Peiffer regarding open case issues including lease rejections, lift stay motions, and DIP budget projections (0.3).	500.00	.80	400.00
08/10/23	SAD	Review NDA (0.1); telephone conference with Elizabeth Janczak regarding NDA (0.1).	595.00	.20	119.00
08/17/23	ELJ	Telephone conference with Terry Gibson regarding Manchester AP/lift stay motion, potential deposition of Dennis Bruce, and pre-petition operations investigation (0.4).	500.00	.40	200.00
08/25/23	ELJ	Telephone conference with Austin Peiffer regarding Manchester lift stay/AP motion and potential Committee Rule 2004 exam (0.2).	500.00	.20	100.00
08/30/23	ELJ	Telephone conference with Austin Peiffer regarding DIP budget, chapter 11 plan status, and Rule 2004 discovery (0.5).	500.00	.50	250.00
	TC	OTAL FEES FOR SERVICES		\$	516,277.50

TIME AND FEE SUMMARY

	Rate	<u>Hours</u>	<u>Amount</u>
Morgan V. Manley	425.00	1.20	510.00
Tonita M. Helton	500.00	1.10	550.00
Jacqueline Webster	315.00	3.90	1,228.50
Elizabeth L. Janczak	500.00	20.60	10,300.00
Shelly A. DeRousse	595.00	6.20	3,689.00
TOTAL		33.00	\$16,277.50

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Matter: 912600.001 Page 6
Invoice No. 1130031 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$16,277.50

THIS STATEMENT REFLECTS ALL PAYMENTS POSTED 5 DAYS PRIOR TO INVOICE DATE.

THIS STATEMENT MAY NOT INCLUDE CHARGES FOR WHICH WE HAVE NOT YET BEEN BILLED,
OR WHICH HAVE NOT YET BEEN POSTED. THESE WILL BE INCLUDED ON A LATER INVOICE.

CERTAIN CHARGES ON YOUR ACCOUNT INCLUDE AN ALLOCATION OF OVERHEAD ASSOCIATED WITH SUCH CHARGE.

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Main: 404-815-3500 www.sgrlaw.com

ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.002 Invoice No. 1130032

Elizabeth L. Janczak

Matter: Litigation

For Professional Services......\$5,940.00

Current Invoice Amount\$5,940.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit Group Exhibit A Page 10 of 51

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ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

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 1

 Date:
 September 12, 2023

 Matter:
 912600.002

 Invoice No.
 1130032

Elizabeth L. Janczak

Matter: Litigation

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
07/07/23	ELJ	Review summary of potential preference claims (0.2); email correspondence to Morgan Manley regarding same (0.1).	500.00	.30	150.00
07/07/23	MVM	Create excel spreadsheet analyzing potential preference claims (2.6); e-mail correspondence to Elizabeth Janczak regarding same (0.1).	425.00	2.70	1147.50
07/27/23	ELJ	Draft list of potential Rule 2004 targets for investigation of operations and assets (0.2).	500.00	.20	100.00
08/08/23	ELJ	Review BDC complaint against Mid-American and related pleadings (0.3).	500.00	.30	150.00
08/21/23	ELJ	Review Isotropic Rule 2004 motion and order (0.1); draft list of Rule 2004 targets and information to be requested from same (1.4); telephone conference with Morgan Manley regarding same (0.2).	500.00	1.70	850.00
08/21/23	MVM	Make final edits to and finalize riders to discovery requests to BDC Group, Keystone, Capital One, F+M Bank, and Divvy (0.1); email correspondence with Elizabeth Janczak transmitting same (0.1).	425.00	.20	85.00
08/22/23	ELJ	Review exhibits to Bruce deposition by Isotropic (0.2).	500.00	.20	100.00
08/23/23	ELJ	Attend Dennis Bruce deposition by Isotropic (2.3).	500.00	2.30	1150.00
08/24/23	ELJ	Review and revise Rule 2004 subpoenas (2.1); e-mail correspondence to Morgan Manley regarding same (0.1); telephone conference with Morgan Manley regarding same (0.3).	500.00	2.50	1250.00

PAYMENT IS DUE ON PRESENTATION, AND PAST DUE AFTER 30 DAYS

PLEASE ENCLOSE REMITTANCE PAGE WITH PAYMENT TO ENSURE PROPER CREDIT

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit **SMITH, GAMBRELL & RUSSEL Entered Exhibit** A Page 11 of 51

 Matter:
 912600.002
 Page 2

 Invoice No.
 1130032
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
08/24/23	MVM	Complete draft rider to Committee's requests for documents from BDC Group Inc (0.4); complete draft rider to Committee's requests for documents from Divvy (0.2); complete draft rider to Committee's requests for documents from Capital One (0.1); complete draft rider to Committee's requests for documents from Farmers and Merchants Bank (0.2); complete draft rider to Committee's requests for documents from Keystone (0.3); email correspondence to Elizabeth Janczak conveying same (0.1); telephone conference with Elizabeth Janczak to discuss edits to Riders (0.3).	425.00	1.60	680.00
08/25/23	ELJ	Multiple e-mail correspondence with Abe Carls regarding Rule 2004 request to Keystone (0.2).	500.00	.20	100.00
08/25/23	MVM	Make final edits to and finalize riders to discovery requests to BDC Group, Keystone, Capital One, F+M Bank, and Divvy (.1); email correspondence with Elizabeth Janczak transmitting same (.1)	425.00	.10	42.50
08/28/23	ELJ	E-mail correspondence to Austin Peiffer regarding Committee Rule 2004 exam of BDC (0.1).	500.00	.10	50.00
08/31/23	MVM	Leave voice message for Capital One Bank regarding scheduling a meet and confer on discovery requests from creditors' committee to Capital One (0.1); email correspondence to Capital One concerning same (0.1).	425.00	.20	85.00
TOTAL FEES FOR SERVICES				\$	5,940.00

TIME AND FEE SUMMARY

		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Morgan V. Manley		425.00	4.80	2,040.00
Elizabeth L. Janczak		500.00	7.80	3,900.00
	TOTAL	-	12.60	\$5,940.00

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit **SMITH**, **GAMBRELL & RUSSELE Comp** Exhibit A Page 12 of 51

Matter: 912600.002 Page 3
Invoice No. 1130032 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$5,940.00

THIS STATEMENT REFLECTS ALL PAYMENTS POSTED 5 DAYS PRIOR TO INVOICE DATE.

THIS STATEMENT MAY NOT INCLUDE CHARGES FOR WHICH WE HAVE NOT YET BEEN BILLED,
OR WHICH HAVE NOT YET BEEN POSTED. THESE WILL BE INCLUDED ON A LATER INVOICE.

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ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.003 Invoice No. 1130033

Elizabeth L. Janczak

Matter: Credit Inquiries and Negotiations

For Professional Services \$100.00

Current Invoice Amount\$100.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
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Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit Group Exhibit A Page 14 of 51

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

 Page
 1

 Date:
 September 12, 2023

 Matter:
 912600.003

 Invoice No.
 1130033

Elizabeth L. Janczak

Matter: Credit Inquiries and Negotiations

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
07/25/23	ELJ	Telephone call from creditor regarding proof of claim requirements and review filed claim relating to same (0.1).	500.00	.10	50.00
08/22/23	ELJ	Telephone conference with Jeff Goetz (counsel for RP Construction) regarding case status (0.1).	500.00	.10	50.00
	TC	OTAL FEES FOR SERVICES			\$100.00

TIME AND FEE SUMMARY

		Rate	<u>Hours</u>	<u>Amount</u>
Elizabeth L. Janczak		500.00	0.20	100.00
	TOTAL	•	0.20	\$100.00

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Matter: 912600.003 Page 2 Invoice No. 1130033 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$100.00

THIS STATEMENT REFLECTS ALL PAYMENTS POSTED 5 DAYS PRIOR TO INVOICE DATE.

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.004 Invoice No. 1130034

Elizabeth L. Janczak

Matter: Secured Credit Issues

For Professional Services......\$33,322.00

Current Invoice Amount\$33,322.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

 Page
 1

 Date:
 September 12, 2023

 Matter:
 912600.004

 Invoice No.
 1130034

Elizabeth L. Janczak

Matter: Secured Credit Issues

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
06/27/23	SAD	Research recorded liens (1.5); e-mail correspondence to Eric Lam regarding Keystone Bank loan documents (0.1).	595.00	1.60	952.00
06/29/23	ELJ	Telephone conference with Shelly DeRousse regarding Committee follow-ups, DIP financing issues, and proposal on DIP financing (0.6).	500.00	.60	300.00
06/29/23	ELJ	Initial review of Keystone loan documents (0.5).	500.00	.50	250.00
06/29/23	SAD	Telephone conference with Elizabeth Janczak regarding DIP loan issues (0.6).	595.00	.60	357.00
06/30/23	ELJ	Review and prepare for call with Abe Carls regarding DIP financing, including review of interim order (0.4); telephone conference with Abe Carls and Shelly DeRousse regarding same (1.0); telephone conferences with Shelly DeRousse regarding same (0.3); continue review of pre-petition loan documents (0.4); telephone conference with Shelly DeRousse and Kristina Stanger regarding proposed DIP terms (0.5).	500.00	2.60	1300.00
06/30/23	SAD	Telephone conference with Abe Carls and Elizabeth Janczak regarding Keystone Bank DIP issues (1.0); telephone conference with Elizabeth Janczak regarding DIP objections and timing issues (0.3).	595.00	1.30	773.50
07/05/23	ELJ	Draft redline of final DIP order and agreement (1.9).	500.00	1.90	950.00

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit **SMITH, GAMBRELL & RUSSEL Entered Exhibit** A Page 18 of 51

 Matter:
 912600.004
 Page 2

 Invoice No.
 1130034
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/07/23	ELJ	Telephone conference with Shelly DeRousse to discuss and make additional revisions to DIP financing agreement, DIP order, and DIP budget (1.0); e-mail correspondence to Abe Carls and Austin Peiffer regarding same (0.2); review various secured loan agreements with MCAs (0.6).	500.00	1.80	900.00
07/07/23	SAD	Review DIP loan agreement and revise (1.3); telephone conference with Elizabeth Janczak regarding necessary changes to provisions of DIP loan agreement (1.0).	595.00	2.30	1368.50
07/10/23	SAD	Telephone conference with Abe Carls regarding documents needed from lender (0.1); e-mail correspondence to Abe Carls regarding documents (0.1); research regarding liens (0.1).	595.00	.30	178.50
07/11/23	ELJ	Telephone conference with Abe Carls, Austin Peiffer, and Shelly DeRousse regarding DIP loan order and agreement issues (1.4); review and prepare for same (0.3).	500.00	1.70	850.00
07/11/23	MVM	Review vehicle titles received from Elizabeth Janczak in connection with lien analysis (0.2); begin comparison of same to equipment and vehicles listed on schedules (0.6).	425.00	.80	340.00
07/11/23	SAD	Telephone conference with Austin Peiffer, Abe Carls and Elizabeth Janczak regarding DIP loan and cash collateral issues (1.4); review and prepare for same including review of prior drafts and redlines (0.8); conferences with Elizabeth Janczak regarding negotiation of DIP loan agreement and Order and perfection of collateral. (0.3).	595.00	2.60	1547.00
07/12/23	ELJ	Review redline of DIP order and agreement (0.3).	500.00	.30	150.00
07/12/23	MVM	Review existing spreadsheet of equipment and vehicles (0.1); compile and perform analysis of titles as compared to vehicles and equipment on schedules in excel worksheet (2.1).	425.00	2.20	935.00
07/13/23	ELJ	Revise DIP order and agreement (0.6); research case law relating to same (0.6); telephone conference with Shelly DeRousse regarding revisions to same (0.4); e-mail correspondence to Abe Carls regarding same (0.2); telephone conference with Morgan Manley regarding analysis of liens on vehicles and trailers (0.2); draft witness and exhibit list for July 20th hearing on DIP (0.5).	500.00	2.50	1250.00

 Matter:
 912600.004
 Page 3

 Invoice No.
 1130034
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/13/23	MVM	Complete analysis of equipment and vehicles (2.0); e-mail correspondence to Elizabeth Janczak regarding same (0.1); telephone conference with Elizabeth Janczak regarding same (0.2).	425.00	2.30	977.50
07/13/23	SAD	Telephone conference with Elizabeth Janczak regarding DIP loan negotiations (0.4).	595.00	.40	238.00
07/14/23	ELJ	Review and revise list of unencumbered titled vehicles (0.5); e-mail correspondence with Morgan Manley regarding same (0.1); revise and finalize witness and exhibit list and list of exhibits for 7/20 hearing (1.1); e-mail correspondence to Jackie Webster regarding same (0.1).	500.00	1.80	900.00
07/14/23	MVM	Update analysis incorporating additional tabs requested Elizabeth Janczak (0.3); e-mail correspondence to Elizabeth Janczak regarding same (0.1).	425.00	.40	170.00
07/17/23	ELJ	Review and revise DIP order and agreement (0.4); telephone conference with Shelly DeRousse regarding open items relating to same (0.2); telephone conference with Austin Peiffer regarding same (0.4); e-mail correspondence to Abe Carls regarding same (0.2); review and prepare for DIP hearing including review and analysis of exhibits (0.5).		1.70	850.00
07/17/23	SAD	Telephone conference with Elizabeth Janczak regarding DIP motion (0.2).	595.00	.20	119.00
07/18/23	ELJ	Review 7/14 variance report and updated DIP budget (0.6); conference with Shelly DeRousse regarding same (0.4); review Keystone loan documents, security agreements, and financing statements in connection with investigation of prepetition liens (2.0); multiple e-mail correspondence with Austin Peiffer regarding DIP budget and 7/20 hearing (0.2).	500.00	3.20	1600.00
07/18/23	SAD	Office conference with Elizabeth Janczak regarding budget issues and DIP loan (0.4); review multiple e-mail correspondence with Austin Peiffer regarding DIP issues (0.3).	595.00	.70	416.50

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Invoice No. 1130034 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/19/23	ELJ	Review revised DIP budget (0.4); e-mail correspondence to Joe Peiffer and Austin Peiffer regarding same (0.2); telephone conference with Shelly DeRousse regarding status of DIP negotiations (0.2); telephone conferences with Kristina Stanger regarding same (0.3); multiple e-mail correspondence with Austin Peiffer and Abe Carls regarding DIP budget and agreement issues (0.4); e-mail correspondence to Janet Reasoner and Claire Davidson regarding same (0.1); telephone conference with Abe Carls regarding DIP hearing issues (0.7); review and prepare for final DIP hearing including review of amended exhibit list, exhibits, and updated drafts (0.5).	500.00	2.80	1400.00
07/19/23	SAD	Telephone conference with Elizabeth Janczak regarding DIP loan and cash collateral issues (0.2).	595.00	.20	119.00
07/20/23	ELJ	Review and prepare for hearing on final DIP order (0.7); telephone conference with Shelly DeRousse regarding DIP loan hearing (0.2).	500.00	.90	450.00
07/20/23	SAD	Telephone conference with Elizabeth Janczak in preparation of hearing on DIP loan (0.2).	595.00	.20	119.00
07/24/23	MVM	E-mail to Elizabeth Janczak inquiring on update on schedules in connection with lien analysis (0.1).	425.00	.10	42.50
07/25/23	ELJ	E-mail correspondence to Abe Carls regarding DIP funding and lockbox access (0.1).	500.00	.10	50.00
07/26/23	ELJ	Review updated list of equipment and vehicles and insurance values in connection with lien analysis (0.2); email correspondence to Morgan Manley regarding same (0.1).	500.00	.30	150.00
07/26/23	MVM	Review vehicle schedule provided by debtor and update spreadsheet analysis based on same (0.7).	425.00	.70	297.50
07/27/23	ELJ	Review updated list of equipment and vehicles for lien perfection issues (0.4); e-mail correspondence with Morgan Manley regarding same (0.1).	500.00	.50	250.00
07/27/23	MVM	Review scheduled equipment from debtor and update analysis on spreadsheet concerning same (0.7); e-mail correspondence with Elizabeth Janczak regarding same (0.1).	425.00	.80	340.00
07/28/23	ELJ	Review Deere motion to lift stay and for adequate protection (0.3).	500.00	.30	150.00

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Invoice No. 1130034 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/31/23	ELJ	Draft summary of initial findings and conclusions regarding Keystone prepetition liens and perfection issues (2.4); email correspondence to Shira Isenberg regarding same (0.2).	500.00	2.60	1300.00
07/31/23	SRI	E-mail correspondence with Elizabeth Janczak regarding collateral analysis (0.1); begin to review analysis and schedules regarding same (0.2).	500.00	.30	150.00
08/02/23	ELJ	Telephone conference with Shira Isenberg regarding collateral analysis review (0.3).	500.00	.30	150.00
08/02/23	SRI	Telephone conference with Elizabeth Janczak regarding collateral analysis (0.3); review collateral analysis (0.1).	500.00	.40	200.00
08/03/23	ELJ	E-mail correspondence with Joe Peiffer regarding DIP budget issues (0.1); review revised DIP budget and compare to prior budget (0.2).	500.00	.30	150.00
08/04/23	ELJ	E-mail correspondence with Joe Peiffer regarding interim DIP extension (0.1).	500.00	.10	50.00
08/11/23	ELJ	Review Deere lift stay motion (0.2); telephone conference with Abe Carls regarding same (0.2); draft objection to same (0.3); telephone conference with Austin Peiffer regarding Deere and Manchester motions (0.3).	500.00	1.00	500.00
08/11/23	ELJ	Compare Deere and Manchester proofs of claim to schedules and appraisals in connection with adequate protection motions (2.7).	500.00	2.70	1350.00
08/11/23	KNR	File Objection to Motion to Lift Stay.	300.00	.20	60.00
08/11/23	MVM	Review and update spreadsheets concerning titled vehicles based on additional information received from Debtor (0.8); email correspondence to Elizabeth Janczak concerning same (0.1).	425.00	.90	382.50
08/11/23	SRI	Review collateral analysis and loan documents (1.5).	500.00	1.50	750.00
08/14/23	ELJ	Continue review and analysis of vehicle and equipment spreadsheet and compare to proofs of claim in connection with pending and potential lift stay motions (1.2); e-mail correspondence to Austin Peiffer regarding same (0.2); e-mail correspondence with Wes Huisinga regarding Deere lift stay motion (0.1).	500.00	1.50	750.00
08/14/23	SRI	Analyze loan documents and schedules in order to analyze collateral analysis (3.2); multiple e-mail correspondence with Elizabeth Janczak regarding same (0.2).	500.00	3.40	1700.00

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Matter: 912600.004 Page 6
Invoice No. 1130034 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
08/15/23	ELJ	Multiple e-mail correspondence with Abe Carls and Wes Huisinga regarding Deere adequate protection/lift stay motion and related issues (0.3); e-mail correspondence with Shira Isenberg regarding review of KSB liens (0.2); review Manchester lift stay/adequate protection motion and value issues (0.3); e-mail correspondence to Terry Gibson regarding trailer titles (0.1); draft summary and analysis of KSB liens for Committee (1.5).	500.00	2.40	1200.00
08/15/23	SRI	Multiple e-mail correspondence with Elizabeth Janczak regarding review of collateral analysis and review notes for same (0.3).	500.00	.30	150.00
08/16/23	ELJ	Conference with Shelly DeRousse regarding Deere and Manchester stay relief/adequate protection issues (0.2); review proposed order on Deere lift stay/AP motion (0.2); multiple e-mail correspondence with debtor's and lenders' counsel regarding same (0.4); conference call with Austin Peiffer, Abe Carls, and Wes Huisinga regarding Deere motion and potential resolution (0.7); revise proposed order on same and additional review and revision of further versions of same (0.5); review proposed two-week DIP budget and e-mail correspondence to Austin Peiffer regarding same (0.3).	500.00	2.30	1150.00
08/17/23	ELJ	E-mail correspondence with Austin Peiffer and Wes Huisinga regarding Deere lift stay/AP order (0.4); review and prepare for hearing on Deere lift stay/AP motion (0.2); attend same (0.4).	500.00	1.00	500.00
08/18/23	ELJ	Draft objection to Manchester AP/lift stay motion (0.2); e-mail correspondence with Jacqueline Webster regarding same (0.1); multiple e-mail correspondence with Austin Peiffer regarding DIP extension and budget (0.2); review revised DIP extension order (0.1).	500.00	.60	300.00
08/18/23	JW	File objection to motion to lift stay (0.1); e-mail correspondence with Elizabeth Janczak regarding same (0.1).	315.00	.20	63.00
08/21/23	ELJ	E-mail correspondence from Abe Carls and Austin Peiffer regarding Deere lift stay/AP order (0.2); e-mail correspondence from Terry Gibson regarding Manchester lift stay/AP proposal (0.1).	500.00	.30	150.00

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 Invoice No.
 1130034
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
08/23/23	ELJ	Review and revise Caterpillar lift stay motion and order on financed equipment (0.3); e-mail correspondence to Austin Peiffer regarding Manchester lift stay terms (0.1).	500.00	.40	200.00
08/23/23	SAD	Conference with Elizabeth Janczak regarding DIP issues (0.3).	595.00	.30	178.50
08/25/23	ELJ	Attend hearing on Manchester Leasing lift stay/AP motion (0.2).	500.00	.20	100.00
08/31/23	ELJ	Review BDC's proposed new DIP budget and draft summary of issues and questions relating to same (0.6); conference with Shelly DeRousse regarding same (0.2); review draft proposed order on Manchester collateral and adequate protection (0.2).	500.00	1.00	500.00
08/31/23	SAD	Review debtor's budget (0.3); conference with Liz Janczak regarding budget and DIP loan (0.2).	595.00	.50	297.50
	TC	OTAL FEES FOR SERVICES			33,322.00

TIME AND FEE SUMMARY

	Rate	<u>Hours</u>	<u>Amount</u>
Morgan V. Manley	425.00	8.20	3,485.00
Jacqueline Webster	315.00	0.20	63.00
Shira R. Isenberg	500.00	5.90	2,950.00
Elizabeth L. Janczak	500.00	40.20	20,100.00
Shelly A. DeRousse	595.00	11.20	6,664.00
Kirstin N. Rower	300.00	0.20	60.00
TOTAL		65.90	\$33,322.00

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Matter: 912600.004 Page 8
Invoice No. 1130034 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$33,322.00

THIS STATEMENT REFLECTS ALL PAYMENTS POSTED 5 DAYS PRIOR TO INVOICE DATE.

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OR WHICH HAVE NOT YET BEEN POSTED. THESE WILL BE INCLUDED ON A LATER INVOICE.

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Main: 404-815-3500 www.sgrlaw.com

ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.005 Invoice No. 1130035

Matter: SGR Retention and Fee Applications

Elizabeth L. Janczak

For Professional Services.....\$2,939.50

Current Invoice Amount\$2,939.50

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit Group Exhibit A Page 26 of 51

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

 Page
 1

 Date:
 September 12, 2023

 Matter:
 912600.005

 Invoice No.
 1130035

Elizabeth L. Janczak

Matter: SGR Retention and Fee Applications

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
06/26/23	SAD	Draft retention documents (0.3).	595.00	.30	178.50
06/27/23	ELJ	Begin drafting SGR retention application (0.4); multiple email correspondence with Jackie Webster regarding pro hac applications and motion deadlines (0.2).	500.00	.60	300.00
06/27/23	JW	Review local admission procedures for the Northern District of Iowa bankruptcy court and affiliation with the Southern District (0.4); confirm Tonita Helton's standing with the Southern District (0.2).	315.00	.60	189.00
06/29/23	ELJ	Continue drafting SGR retention application, declaration, and proposed order (1.2).	500.00	1.20	600.00
06/30/23	ELJ	Finalize retention application and declaration (0.2).	500.00	.20	100.00
06/30/23	JW	Review local rules and procedures regarding filing retention application and notice of same (0.4) ; e-mail correspondence with Elizabeth Janczak regarding same (0.1) ; file same (0.1) ; submit proposed order regarding same (0.1) .	315.00	.70	220.50
06/30/23	SAD	Review retention application and declaration and revise same (0.5); multiple e-mail correspondence with Elizabeth Janczak regarding retention application(0.1).	595.00	.60	357.00
07/05/23	JW	E-mail correspondence with Elizabeth Janczak regarding filing attorney certificates of good standing in relation to pro hac vice applications (0.1); file same (0.2).	315.00	.30	94.50
07/12/23	ELJ	Review exhibits to fee statements to ensure compliance with time detail requirements (0.4).	500.00	.40	200.00

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 Matter:
 912600.005
 Page 2

 Invoice No.
 1130035
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/18/23	ELJ	Review interim compensation procedures cases in Iowa bankruptcy cases (0.4).	500.00	.40	200.00
08/01/23	ELJ	Review exhibits to fee application to ensure compliance with time detail requirements (0.2).	500.00	.20	100.00
08/07/23	ELJ	Review exhibits to fee application to ensure compliance with time detail requirements (0.5).	500.00	.50	250.00
08/09/23	ELJ	Additional review of exhibits to fee application (0.3).	500.00	.30	150.00
	TO	OTAL FEES FOR SERVICES			\$2,939.50

TIME AND FEE SUMMARY

		Rate	<u>Hours</u>	<u>Amount</u>
Jacqueline Webster		315.00	1.60	504.00
Elizabeth L. Janczak		500.00	3.80	1,900.00
Shelly A. DeRousse		595.00	0.90	535.50
	TOTAL		6.30	\$2,939.50

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$2,939.50

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023
Matter: 912600.006
Invoice No. 1130036

Elizabeth L. Janczak

Matter: Other Professional Retention

For Professional Services......\$2,425.50

Current Invoice Amount\$2,425.50

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Page 1
Date: September 12, 2023
Matter: 912600.006
Invoice No. 1130036

Elizabeth L. Janczak

Matter: Other Professional Retention

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
07/06/23	SAD	Telephone conference with Elizabeth Janczak regarding debtor's compensation issues (0.1).	595.00	.10	59.50
07/10/23	SAD	Research ABLS retention issue (0.3).	595.00	.30	178.50
07/19/23	ELJ	Review KSB's pre-hearing brief regarding prepetition retainer in connection with ABLS employment (0.5); draft Committee's pre-hearing brief regarding same (1.5).	500.00	2.00	1000.00
07/20/23	ELJ	Finalize prehearing brief on ABLS retainer and KSB objection to employment, including additional research for same (0.8).	500.00	.80	400.00
07/20/23	SAD	Research regarding continuation of security interest in IOLTA in connection with ABLS employment (0.5).	595.00	.50	297.50
08/17/23	ELJ	Initial review of ABLS first interim fee application and e- mail correspondence to Morgan Manley regarding same (0.3).	500.00	.30	150.00
08/30/23	MVM	Review and analyze Debtor's counsel's First Interim Application for Compensation for professional services rendered from June 13, 2023 through August 10, 2023 (0.7); email correspondence to Elizabeth Janczak with comments on same (0.1).	425.00	.80	340.00
TOTAL FEES FOR SERVICES					\$2,425.50

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit **SMITH**, **GAMBRELL & RUSSEL Entered Exhibit** A Page 30 of 51

Matter: 912600.006 Page 2
Invoice No. 1130036 September 12, 2023

TIME AND FEE SUMMARY

		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Morgan V. Manley		425.00	0.80	340.00
Elizabeth L. Janczak		500.00	3.10	1,550.00
Shelly A. DeRousse		595.00	0.90	535.50
Т	OTAL		4.80	\$2,425.50

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$2,425.50

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023
Matter: 912600.008
Invoice No. 1130037

Elizabeth L. Janczak

Matter: Executory Contract and Unexpired Leases

For Professional Services.....\$2,215.00

Current Invoice Amount......\$2,215.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

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 1

 Date:
 September 12, 2023

 Matter:
 912600.008

 Invoice No.
 1130037

Elizabeth L. Janczak

Matter: Executory Contract and Unexpired Leases

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
08/07/23	ELJ	Review Manchester motion to reject leases and initial review of filed lease claims (0.6).	500.00	.60	300.00
08/16/23	ELJ	Telephone conference with Morgan Manley regarding review of Manchester true leases (0.1); e-mail correspondence to Morgan Manley regarding same (0.1).	500.00	.20	100.00
08/17/23	ELJ	Initial review of notice to reject BMO lease and e-mail correspondence to Morgan Manley regarding same (0.3).	500.00	.30	150.00
08/17/23	MVM	Perform research and analysis on 8th circuit analysis of true leases (2.0).	425.00	2.00	850.00
08/18/23	ELJ	E-mail correspondence with Morgan Manley regarding Manchester true lease issues (0.1).	500.00	.10	50.00
08/18/23	MVM	Complete research on 8th circuit analysis of true leases (0.5) review and analyze Manchester's motion to set a deadline to assume or rejection of certain true leases including performing analysis of underlying leases (0.7); draft email and chart summarizing analysis of same (0.5); email correspondence to Elizabeth Janczak conveying aforementioned analysis of Manchester's leases (0.1).	425.00	1.80	765.00
TOTAL FEES FOR SERVICES				\$2,215.00	

Matter: 912600.008 Page 2 Invoice No. 1130037 September 12, 2023

TIME AND FEE SUMMARY

		Rate	<u>Hours</u>	<u>Amount</u>
Morgan V. Manley		425.00	3.80	1,615.00
Elizabeth L. Janczak		500.00	1.20	600.00
	TOTAL		5.00	\$2,215.00

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$2,215.00

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ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023
Matter: 912600.009
Invoice No. 1130038

Elizabeth L. Janczak

Matter: Committee Meeting and Governance

For Professional Services......\$5,668.00

Current Invoice Amount\$5,668.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit Group Exhibit A Page 35 of 51

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Page 1
Date: September 12, 2023
Matter: 912600.009
Invoice No. 1130038

Elizabeth L. Janczak

Matter: Committee Meeting and Governance

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
06/26/23	ELJ	Initial telephone conference with Committee regarding retention and case strategy (0.3).	500.00	.30	150.00
06/26/23	SAD	Telephone conference with committee and Elizabeth Janczak regarding introduction and committee governance (0.3); e-mail correspondence to Reyna Paz regarding committee introduction call (0.1); e-mail correspondence to Tammy Kemp regarding retention (0.1).	595.00	.50	297.50
06/27/23	ELJ	Draft Committee contact list and bylaws (1.1).	500.00	1.10	550.00
06/27/23	SAD	Telephone conference with Reyna Paz of RP Construction regarding committee overview (0.4); e-mail correspondence with Reyna Paz regarding information about BDC (0.1).	595.00	.50	297.50
06/28/23	ELJ	E-mail correspondence to Committee regarding committee call and draft governance documents (0.1).	500.00	.10	50.00
06/29/23	ELJ	Review and prepare for initial Committee meeting (0.2); attend initial Committee meeting regarding case status, strategy, and governance (0.8); multiple e-mail correspondence to Committee regarding bylaws and related Committee governance documents (0.1).	500.00	1.10	550.00
06/29/23	SAD	Prepare for call with committee members (0.5); attend committee meeting regarding committee formation and governance and open case issues (0.8).	595.00	1.30	773.50
07/07/23	SAD	E-mail correspondence to committee regarding status meeting (0.1) .	595.00	.10	59.50

Case 23-00484 Doc 192-1 Filed 09/14/23 Entered 09/14/23 10:45:35 Desc Exhibit **SMITH, GAMBRELL & RUSSEL Entered Exhibit** A Page 36 of 51

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 Page 2

 Invoice No.
 1130038
 September 12, 2023

Date	Biller	Narrative	Rate	Time	Fee
07/10/23	ELJ	Conference call with Committee regarding case status, meeting of creditors, and status of DIP financing discussions (0.6); telephone conference with Reyna Paz regarding same (0.1); review and prepare for same (0.3).	500.00	1.00	500.00
07/10/23	SAD	E-mail correspondence with Brandon Kuenzi regarding letter from creditor (0.1); prepare for committee call (0.5); attend committee Zoom meeting (0.6).	595.00	1.20	714.00
07/18/23	ELJ	E-mail correspondence to Committee regarding status of DIP loan negotiations and hearing (0.2).	500.00	.20	100.00
07/25/23	ELJ	E-mail correspondence to Committee regarding 7/20 hearing update and next steps (0.3).	500.00	.30	150.00
08/02/23	ELJ	E-mail correspondence to Committee regarding case status update and equipment appraisal (0.2).	500.00	.20	100.00
08/11/23	ELJ	Lengthy e-mail correspondence to Committee updating them on various case issues including Deere and Manchester motions, asset appraisal, and related items (0.3).	500.00	.30	150.00
08/14/23	SAD	Review draft e-mail correspondence to committee (0.2).	595.00	.20	119.00
08/16/23	SAD	Telephone conference with Elizabeth Janczak regarding John Deere lift stay motion (0.2).	595.00	.20	119.00
08/17/23	ELJ	E-mail correspondence to the Committee regarding various case updates including Keystone analysis, Deere motions, and chapter 11 status (0.5).	500.00	.50	250.00
08/21/23	ELJ	Conference call with Brandon Kuenzi regarding case status and various open issues (0.4); review and prepare for same (0.1); lengthy e-mail correspondence to Committee regarding same and next steps (0.4).	500.00	.90	450.00
08/21/23	SAD	Attend committee meeting via telephone (0.4).	595.00	.40	238.00
08/25/23	ELJ	Telephone calls to Brandon Kuenzi and Reyna Paz regarding case open items (0.1).	500.00	.10	50.00
	TC	OTAL FEES FOR SERVICES			\$5,668.00

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Matter: 912600.009 Page 3
Invoice No. 1130038 September 12, 2023

TIME AND FEE SUMMARY

		Rate	<u>Hours</u>	<u>Amount</u>
Elizabeth L. Janczak		500.00	6.10	3,050.00
Shelly A. DeRousse		595.00	4.40	2,618.00
	TOTAL		10.50	\$5,668.00

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$5,668.00

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ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023
Matter: 912600.010
Invoice No. 1130039

Elizabeth L. Janczak

Matter: Investigation of Operations

For Professional Services.....\$3,138.00

Current Invoice Amount\$3,138.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

 Page
 1

 Date:
 September 12, 2023

 Matter:
 912600.010

 Invoice No.
 1130039

Elizabeth L. Janczak

Matter: Investigation of Operations

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
07/10/23	SAD	Research regarding debtor's assets and issues relating to same (0.4).	595.00	.40	238.00
07/11/23	ELJ	Review financial statements and related documents produced by BDC (0.5).	500.00	.50	250.00
07/12/23	ELJ	Review BDC and Keystone document productions in connection with investigation of BDC's prepetition operations and conduct, including bank statements, insider transfers, and assets (1.9).	500.00	1.90	950.00
07/13/23	ELJ	Continue reviewing documents produced by BDC in connection with investigation into pre-bankruptcy conduct and estate claims (1.4).	500.00	1.40	700.00
07/17/23	ELJ	Continue reviewing BDC's prepetition operations to evaluate potential estate assets and claims including review of financial statements, tax returns, and bank statements (1.1).	500.00	1.10	550.00
08/09/23	ELJ	Review proofs of claim and background documents for asset investigation (0.4).	500.00	.40	200.00
08/14/23	ELJ	Review bank statements and credit card statements relating to assets missing from schedules (0.5).	500.00	.50	250.00
	TC	OTAL FEES FOR SERVICES			\$3,138.00

Matter: 912600.010 Page 2
Invoice No. 1130039 September 12, 2023

TIME AND FEE SUMMARY

		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Elizabeth L. Janczak		500.00	5.80	2,900.00
Shelly A. DeRousse		595.00	0.40	238.00
	TOTAL		6.20	\$3,138.00

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$3,138.00

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ATLANTA, GA 31193-0930



BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.011 Invoice No. 1130040

Elizabeth L. Janczak

Matter: Asset Sales

For Professional Services.....\$1,500.00

Current Invoice Amount\$1,500.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

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 Date:
 September 12, 2023

 Matter:
 912600.011

 Invoice No.
 1130040

Elizabeth L. Janczak

Matter: Asset Sales

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
08/02/23	ELJ	Review redacted equipment appraisal (0.1).	500.00	.10	50.00
08/09/23	ELJ	Review NDA for asset appraisal and employment order relating to same (0.2).	500.00	.20	100.00
08/10/23	ELJ	Review and revise NDA for asset appraisal (0.2); review unredacted vehicle and equipment appraisal and compare to schedules (2.0).	500.00	2.20	1100.00
08/11/23	ELJ	Continue analysis of equipment and vehicles as compared to appraisal (0.5).	500.00	.50	250.00
	TC	OTAL FEES FOR SERVICES			\$1,500.00

TIME AND FEE SUMMARY

		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Elizabeth L. Janczak		500.00	3.00	1,500.00
	TOTAL		3.00	\$1,500.00

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Matter: 912600.011 Page 2
Invoice No. 1130040 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$1,500.00

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023 Matter: 912600.012 Invoice No. 1130041

Elizabeth L. Janczak

Matter: Schedules and Reports

For Professional Services.....\$2,594.50

Current Invoice Amount\$2,594.50

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Page 1
Date: September 12, 2023
Matter: 912600.012
Invoice No. 1130041

Elizabeth L. Janczak

Matter: Schedules and Reports

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
06/28/23	SAD	Review schedules of assets and liabilities and statement of financial affairs (1.1).	595.00	1.10	654.50
07/05/23	MVM	Telephone conference with Elizabeth Janczak concerning review of potential preference claims (0.3).	425.00	.30	127.50
07/06/23	ELJ	Review schedules and SOFA in preparation for 341 meeting of creditors (1.9).	500.00	1.90	950.00
07/06/23	MVM	Begin review payments made within the preference period (0.4); e-mail correspondence to Elizabeth Janczak with questions concerning lease payments (0.1).	425.00	.50	212.50
07/10/23	ELJ	Review amended schedules and statement of financial affairs (1.2); e-mail correspondence to Committee regarding same (0.1).	500.00	1.30	650.00
	TC	TAL FEES FOR SERVICES			\$2,594.50

TIME AND FEE SUMMARY

	Rate	<u>Hours</u>	<u>Amount</u>
Morgan V. Manley	425.00	0.80	340.00
Elizabeth L. Janczak	500.00	3.20	1,600.00
Shelly A. DeRousse	595.00	1.10	654.50
TOT	AL	5.10	\$2,594.50

PAYMENT IS DUE ON PRESENTATION, AND PAST DUE AFTER 30 DAYS

PLEASE ENCLOSE REMITTANCE PAGE WITH PAYMENT TO ENSURE PROPER CREDIT

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Matter: 912600.012 Page 2
Invoice No. 1130041 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$2,594.50

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Date: September 12, 2023
Matter: 912600.014
Invoice No. 1130042

Elizabeth L. Janczak

Matter: Travel (always billed at 50% of attorney rates for

this matter)

For Professional Services......\$1,825.00

Current Invoice Amount\$1,825.00

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
WFBIUS6WFFX (for foreign currency)

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Date: September 12, 2023
Matter: 912600.014
Invoice No. 1130042

Elizabeth L. Janczak

Matter: Travel (always billed at 50% of attorney rates for

this matter)

For Professional Services

Date	Biller	Narrative	Rate	Time	Fee
07/19/23	ELJ	Travel to Cedar Rapids, IA for hearing on final DIP and ABLS employment (3.7).	250.00	3.70	925.00
07/20/23	ELJ	Travel from Cedar Rapids, IA from hearing on final DIP and ABLS employment (3.6).	250.00	3.60	900.00
	TC	OTAL FEES FOR SERVICES			\$1,825.00

TIME AND FEE SUMMARY

		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Elizabeth L. Janczak		250.00	7.30	1,825.00
	TOTAL		7.30	\$1,825.00

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 Invoice No.
 1130042
 September 12, 2023

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$1,825.00

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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada

Date: September 12, 2023 Matter: 912600.015 Invoice No. 1130043

Elizabeth L. Janczak

Matter: Expenses

Disbursements.....\$616.85

Current Invoice Amount\$616.85

Wire/ACH payment to Wells Fargo Bank

Account name: SMITH, GAMBRELL & RUSSELL, LLP
Wire routing number: 121000248
ACH routing number: 061000227
Account number: 2000026118644
For international wires: SWIFT = WFBIUS6S (for USD)
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BDC Group Creditors' Committee c/o Tammy Kemp, Chief Credit Officer Liquid Capital Exchange 5075 Yonge Street Suite 700 Canada Page 1
Date: September 12, 2023
Matter: 912600.015
Invoice No. 1130043

Elizabeth L. Janczak

Matter: Expenses

DISBURSEMENTS

06/28/23	Service Fee	31.00
07/19/23	Business Meal	20.25
07/20/23	Business Meal	18.91
07/20/23	Travel Expenses	209.00
07/20/23	Travel Expenses	27.22
	Local Travel Expenses	310.47
	TOTAL	\$616.85

ACCOUNT SUMMARY

CURRENT INVOICE AMOUNT

\$616.85